

[Parties and Counsel Listed on Signature Page]

IN THE UNITED STATES DISTRICT COURT
OR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**JOINT STATUS REPORT ON THE
TIKTOK DEFENDANTS' 30(B)(6)
WITNESS SAMANTHA KERSUL
SEARCH TERMS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

This Document Relates to:

ALL ACTIONS

1 Pursuant to the Court’s Order resolving Plaintiffs’ motion compel the TikTok Defendants
 2 to produce the custodial file of Rule 30(b)(6) witness Samantha Kersul (Dkt. 2327), Plaintiffs and
 3 the TikTok Defendants (collectively, “the Parties”) jointly submit this second report on the status
 4 of the Parties’ negotiations concerning a reasonable subset of search terms.

5 Consistent with the Court’s instruction, the Parties met and conferred via videoconference
 6 on October 27 and again on October 30, 2025, to discuss a proposed set of search terms, which
 7 Plaintiffs proposed on October 23 and to which the TikTok Defendants responded on October 29.
 8 The Parties have since exchanged numerous compromise proposals and on November 19, 2025,
 9 the parties reached agreement on a final set of search terms.

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Dated: November 19, 2025

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Respectfully submitted,

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/s/ Felicia Craick _____

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ByteDance Ltd., and TikTok LLC

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**
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3 I, Felicia Craick, attest that concurrence in the filing of this document has been obtained
4 from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

5 Executed this 19th day of November, 2025, at Seattle, Washington.

6 */s/ Felicia Craick*
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Felicia Craick

CERTIFICATE OF SERVICE

I, Sarah Skaggs, hereby certify that on November 19, 2025, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Sarah Skaggs
Sarah Skaggs